



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

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NAS BRUNSWICK
5090.3a

July 9, 2002

Lonnie Monaco (monacolj@exchange.efdnorth.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Draft Record of Decision (ROD) for Site 7, Naval Air Station Brunswick, Maine

Dear Mr. Monaco:

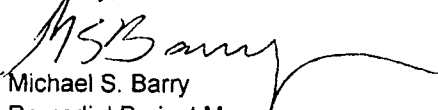
Thank you for the opportunity to review the above document which was submitted by EA Engineering, Science and Technology on behalf of the Navy on June 12, 2002.

EPA's specific comments are attached. We have several general comments.

- The overall means by which (and by whom) Institutional Controls will be periodically monitored or verified needs to be stated in the ROD. This will complement the clear guidance already provided by the NASB Operations Instructions regarding what and where the IC's are and how they will be maintained during public works projects.
- The evaluation of technologies such as phytoremediation or groundwater neutralization to optimize the remedy optimization should be mentioned in the ROD in a similar manner as in the Proposed Plan

EPA would like to acknowledge that the draft ROD reads well and follows EPA Region 1's model ROD guidance closely. In order to expedite the process, EPA suggests draft final ROD in adobe be emailed to the project team for comment after Naval internal consultation. For any questions, please contact me at 617.918.1344 or barry.michael@epa.gov.

Sincerely,


Michael S. Barry
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. John Beling/EPA (beling.john@epa.gov)
Ed Benedikt/Brunswick Conservation Commission (rbenedik@gwi.net)
Tom Fusco/BACSE (tfusco@clinic.net)
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Tony Williams/NASB (WilliamsA@nasb.navy.mil)

Attachment
US EPA New England Comments to Draft Record of Decision
Site 7, Naval Air Station Brunswick, Maine

Comments are coded as follows:

T-Typo, comments appears to be a typo or administrative error

E-Editorial comment

S-Substantive comment; either formatting per guidance or basic issue

NR-No response or resolution to comment required.

RR-Resolution required via comment response, conference call or email.

1. (T/NR) General. The spelling of "groundwater" varies in several places in the document, request choosing one for the entire document.
2. (T/NR) Page 2-4; B. History of Investigations, Removals and Remedial Actions, 10th bullet. Recommend removing, bullet appears to be specific to site 9.
3. (E/RR) Page 2-4; B. History of Investigations, Removals and Remedial Actions bullets 7, 9, 11 regarding the risk assessment, FS and further action in 1997.
 - a. Recommend that bullet 9 should add that alternatives were not considered for site 7 because no CERCLA risk was indicated.
 - b. There should be a brief sageway on bullet 11 to indicate why further action was undertaken in 1997 despite no CERCA risk on the RI and no alternatives on the FS. This was well done in the proposed plan (Page 5, second column).
4. (E/RR) Page 2-5, B. History of Investigations, Removals and Remedial Actions bullet 14 regarding the removal action. It would add more specific information to add that two soil samples of removed soil indicated 110 and 204 ppm cadmium by fluorescence. Relating that some cadmium containing material was removed lends confidence to the remedy. We note that Region 9 PRG's are 37 ppm (residential)/810 ppm (industrial) and soil-groundwater screening levels are 8ppm (DAF=20) and 0.4ppm (DAF-1), indicating to EPA that a cadmium source zone or impacted area was removed.
5. (E/RR) Page 2-7, 2. Summary. It should be stated why the groundwater is inaccessible; i.e. not a current public drinking water source, not of capacity to be a drinking water source and on an active Navy Installation served by town water.
6. (E/RR) Page 2-8, 1. Groundwater Contamination, first bullet, regarding IC's.
 - a. Suggest the ROD text say "revise" IC's. IC's currently exist (with prior EPA/MEDEP input) at site 7, but will probably need to be revised to remove soil restrictions (no CERCLA risk) and to revise the figures.
 - b. The term "reasonable time frame" to implement (revise) IC's should be either defined, qualified or more specific. We suggest either "...per concurrence of the project team, or select a date - such as 31 December 2002.

7. (S/RR) Page 2-8, 1. Groundwater Contamination, first bullet regarding IC's.
 - a. It should be stated basically how IC's will be monitored. The NASB Operations Instruction describe what the IC's are and provides specific instructions on how they are to be considered during construction projects. However, they are silent on who and how IC's will be monitored; i.e. will someone periodically inspect the site to ensure IC's/land use have not been violated? We suggest either:
 - i. Add a bullet that IC's/Land Use will be noted/verified/report during LTM sampling and add this task to the LTMP, or
 - ii. Add that Navy Environmental Office or Contractor personnel will periodically inspect/verify/report on IC's as part of their normal duties and add task specifics to the NASB Operations Instruction.
 - b. 1st sentence, states that IC's will be implemented without prior written approval of EPA/MEDEP, yet further down in the bullet a consultive process with with EPA/MEDEP is described. It appears this phrase was cut and pasted from another document and a "not" may have been deleted? Suggest to change to read "The Navy will implement institutional controls to prevent use of and contact with ground water at Site 7 with written approval/concurrence from EPA and MEDEP. As IC's are a formal remedy component, concurrence with them should be in writing, if even by an email.
8. (E/RR) Page 2-8, 1. Groundwater Contamination, second bullet regarding IC's. Regarding approval/concurrence of EPA/MEDEP upon any future transfer, it appears the word "not" was dropped in transposition here as well. Also request a specific prior notice of 60 or 90 days be specified, whichever one meshes with the Environmental Baseline Survey (EBS) process as specified in DOD Guidance.
9. (E/NR) Page 2-9, Summary of Site Characteristics, A. Site Overview, bullet 9. Recommend adding that shallow ground water at site 7 is not of sufficient capacity for a public supply well.
10. (E/RR) Page 2-18, Description of Alternatives. Regarding the FS, EPA was under the impression that the FS didn't analyze any alternatives for site 7?
11. (E/RR) Page 2-19, 1. Groundwater Contamination IC's, same as comments 6-8.
12. (S/RR) Page 2-20, Five Year Review. Request inserting "... Site 7, per the FFA, to evaluate...." into the first sentence. This clearly denotes the process by which the review will be performed, as previously agreed, yet doesn't insert undue detail into the ROD.
13. (E/NR) Page 2-25, 6. Implementability. Other factors that make this alternative readily implementable are site 7's location within an active Naval Installation.
14. (S/RR) Page 2-26 to 2-27, Selected Remedy. The evaluation of technologies such as phytoremediation or groundwater neutralization to optimize the remedy optimization should be added to this section in a similar manner as in the Proposed Plan. As this evaluation isn't a formal remedy component or a contingency remedy, it doesn't need to be presented in the description of alternatives or included in the comparative analysis of alternatives; but it should be recorded in the ROD since it was presented to the public in the Proposed Plan.

15. (S/RR) Page 2-27, 2. Institutional Controls. Same as comments 6 - 8.
16. (E/NR) Page 2-28, ARARs: suggest adding a sentence at the beginning of this section:
"Appendix C includes a detailed analysis of the Applicable or Relevant and Appropriate Requirements that are listed below."
17. (S/NR) Responsiveness Summary: EPA understands that the draft ROD was drafted prior to completion of the Responsiveness Summary in order to expedite the process. We request to review an emailed copy of it prior to the final ROD.
18. (T/NR) Page 1-3 signature blocks. Effective 15 July 2002, the EPA signatory has changed to:

Richard Cavagnero, Acting Division Director
Office of Site Remediation & Restoration